

**Evaluation Report
G# 10797, A/N 10214
Willow Gas and Food
500 Willow Rd.
Menlo Park, CA 94025**

Project

Willow Gas and Food has submitted this application to increase the throughput limit at G 10797. Hardware modification is being taken care of under A/N 9540 (site is replacing tanks, lines and dispensers). This station is currently permitted 3.0 million gallons per year (Cond ID#14290). This is the baseline throughput for the station as established under A/N 9540.

A risk screen performed for this application indicates that a 4.07 million-gallons/yr throughput is acceptable under the District's Risk Management Policy. Accordingly, this station will now be conditioned to **4.07 million gallons/yr.** pursuant to condition ID #21898.

The station is within 1000 feet of East Palo Alto high School and Willow Oaks School triggering the public notice requirements of the Water Bill. There are no other schools within ¼ mile of these station.

Before this throughput increase can be approved, a 30-day public comment period will be held. Notice describing the project and announcing the public comment period will be mailed to the parents of students attending the above schools and people living within 1000 feet of the station. The cost of preparing and distributing this notice will be borne by the applicant.

VOC Emission Calculations

Increase:

$$1.07 \text{ million gal/yr} \times 1.27 \text{ \#VOC/1000 gal} = 1359 \text{ \#/yr} \\ = \underline{\underline{3.72 \text{ \#/day}}}$$

Total emissions:

$$4.07 \text{ million gal/yr} \times 1.27 \text{ \#VOC/1000 gal} = 5169 \text{ \#/yr} \\ = \underline{\underline{14.16 \text{ \#/day}}}$$

New Source Review

This station has the potential to emit more than 10# of VOC in a single day, triggering the BACT requirements of Regulation 2-2-301.

BACT for GDFs is considered the use of CARB-certified Phase-I and Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB certified.

Emissions from this station will remain less than 15 tpd. Per Regulation 2-2-302, offsets are not required.

TBACT

The increased risk from this project exceeds 1 per million, triggering the use of TBACT equipment. TBACT for GDFs is considered the use of CARB-certified Phase-I and Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not-CARB certified.

Compliance

This station is equipped with Enhanced Vapor Recover Two-point Phase-I (E O G-70-97A and VR-101) and Healy Vacuum Assist Phase-II (E O G-70-191) vapor recovery equipment. Both systems are CARB certified, satisfying requirements for BACT and TBACT. This equipment also complies with Sections 8-7-301 and 302.

It is Recommend that an amended P/O be granted to this station upon completion of the public comment period.

By: Duncan Campbell Air Quality Technician

Date: 11/30/04